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6 Attorneys for Plaintiffs
7 DEMETRIC DIAZ, OWEN DIAZ,
And LAMAR PATTERSON

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA

10 DEMETRIC DIAZ, OWEN DIAZ, and
11 LAMAR PATTERSON,

12 Plaintiffs, *L.P.*

13 v.

14 TESLA, INC. dba TESLA MOTORS, INC.;
15 CITISTAFF SOLUTIONS, INC.; WEST
VALLEY STAFFING GROU; CHARTWELL
16 STAFFING SERVICES, INC.; and DOES 1-
10 inclusive,

17 Defendants.

Case No. 3:17-cv-06748-WHO

**DECLARATION OF LAMAR
PATTERSON IN SUPPORT OF
PLAINTIFF'S OPPOSITION TO
DEFENDANT CHARTWELL STAFFING
INC.'S MOTION TO COMPEL
ARBITRATION**

Date: February 21, 2018

Time: 2:00 p.m.

Location: San Francisco Courthouse
Courtroom 2-17th Floor
450 Golden Gate Avenue
San Francisco, CA 94102

Judge: Hon. William H. Orrick

Complaint Filed: October 16, 2017

Trial Date: Not Set

28 DECLARATION OF LAMAR PATTERSON, IN SUPPORT OF
PLAINTIFF'S OPPOSITION TO DEFENDANT CHARTWELL STAFFING INC.'S MOTION TO COMPEL
ARBITRATION

1 I, LAMAR PATTERSON, hereby declare:

2 1. I am the Plaintiff in the above-referenced action, and make all of the statements
3 herein of my personal knowledge, except as to those matters stated on information and belief,
4 and as to those matters, believe them to be true, and if called as a witness, could and would
5 testify competently thereto.

6 2. During the process of obtaining job placement at Tesla, Inc. ("Tesla"), I visited
7 Chartwell Staffing, Inc.'s Hayward, California location. I have never been to Chartwell Staffing,
8 Inc.'s Orange County, California location.

9 3. In approximately January 2016, Chartwell Staffing, Inc. placed me at Tesla's
10 Fremont, California factory. I have not worked at any other Tesla locations.

11 4. I currently reside in Berkeley, California.

12 5. My income for the 2017 year, was approximately \$15,000 to \$20,000.

13 6. The prohibitively high cost of traveling to and from Orange County, and staying
14 in Orange County for purposes of this arbitration, would likely result in my inability to pursue
15 my claims on the merits.

16 I declare under penalty of perjury, under the laws of the State of California and the
17 United States, that the foregoing is true and correct. Executed on January 30, 2018 in Oakland,
18 California.

19
20 
21 Lamar Patterson